

Before the  
**Federal Communications Commission**  
 Washington, DC 20554

In the Matter of )  
 )  
 Biennial Regulatory Review - )  
 Amendment of Parts 0, 1, 13, )  
 22, 24, 26, 27, 80, 87, 90, ) WT Docket No. 98-20  
 95, 97, and 1010 of the )  
 Commission's Rules to Facilitate )  
 the Development and Use of the )  
 Universal Licensing System in ) FCC 98-25  
 the Wireless Telecommunications )  
 Services )  
 )  
 Notice of Proposed Rulemaking )

To: The Commission

**MOTION FOR EXTENSION OF TIME**

Pursuant to Section 1.46 of the Commission's rules, 47 C.F.R. § 1.46, the Federal Communications Bar Association ("FCBA")<sup>1</sup> hereby files this motion for an extension of time for all parties to file reply comments in the above captioned proceeding.<sup>2</sup> The FCBA respectfully requests that the Commission

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<sup>1</sup> The FCBA is a non-profit, non-stock corporation organized under the laws of the District of Columbia, and has been in existence since 1936. The FCBA's membership consists of over 3,100 attorneys and other professionals involved in the development, interpretation and practice of communications law and policy. The FCBA filed Comments in this proceeding on May 22, 1998. These Comments were prepared by the FCBA's Wireless Telecommunications Practice Committee and approved by the FCBA's Executive Committee, its elected board of directors.

<sup>2</sup> *Biennial Regulatory Review - Amendment of Parts 0, 1, 13, 22, 24, 26, 27, 80, 87, 90, 95, 97, and 101 of the Commission's Rules*  
 (continued...)

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extend the date for filing reply comments for 8 days, until June 16, 1998. Reply comments are otherwise due on June 8, 1998.

The Commission's Notice of Proposed Rulemaking in the instant proceeding constitutes an historic change in the Commission's long-standing application preparation and submission processes for wireless licensees. These changes, which include the consolidation of 41 existing application forms into five new electronic forms, and the associated proposal to make substantial streamlining revisions to thirteen rule parts, raise important issues for the wireless industry as well as for licensees in other services who will soon be subject to similar electronic filing procedures.<sup>3</sup> Consequently, the FCBA formed a task force of licensees, attorneys, and other industry professionals ("Task Force") with expertise prosecuting applications and other requests under the Commission's rules. As a result, the FCBA

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<sup>2</sup> (...continued)

to *Facilitate the Development and Use of Universal Licensing System in the Wireless Telecommunications Services*, WT Docket No. 98-20, FCC 98-25, Notice of Proposed Rulemaking ("NPRM"), (rel. March 18, 1998).

<sup>3</sup> Indeed, the Commission has made it clear in recent weeks that it intends to implement electronic filing procedures for as many of its public information collection functions as possible. See *Electronic Filing of documents in Rulemaking Proceedings*, GC Docket No. 97-113, FCC 89-56, Report and Order (rel. April 6, 1998); and *1998 Biennial Regulatory Review - Streamlining of Mass Media Applications, Rules, and Processes*, MM docket No. 98-43, FCC 98-57, Notice of Proposed Rulemaking (rel. April 3, 1998).

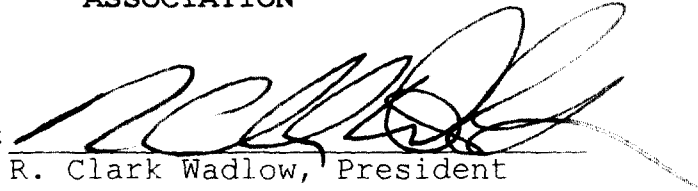
filed Comments in this proceeding on May 22, 1998 exceeding 45 pages in length.

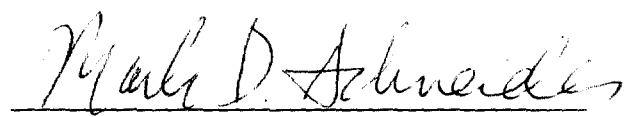
On Friday, May 29, 1998, a representative of the Task Force obtained copies of all other Comments timely submitted in this proceeding. These Comments include approximately 70 filings. Given the volume of these comments, the Task Force will need additional time to review the comments and prepare reply comments. Accordingly, the FCBA respectfully requests that the Commission grant this motion for a brief extension of time to allow the FCBA, as well as others, to gather and present information that will aid the Commission's efforts to streamline its application rules.

Respectfully submitted,

**FEDERAL COMMUNICATIONS BAR  
ASSOCIATION**

By:

  
R. Clark Wadlow, President

  
Wireless Telecommunications  
Practice Committee  
William J. Sill  
Mark D. Schneider  
Luisa Lancetti, Co-Chairs

June 2, 1998